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Attorney for Plaintiff, Edward Patrick Flaherty

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EDWARD PATRICK FLAHERTY, an individual,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION dba WELLS FARGO BANK NA;
and DOES 1-50, ROES 51-100.

Defendants.

CASE NO.: 3:22-cv-00025-MMD-CLB

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
PLAINTIFF TO FILE AMENDED
COMPLAINT**

(First Request)

Plaintiff, Edward Patrick Flaherty ("Plaintiff") and Defendant, Wells Fargo Bank, N.A. ("Wells Fargo") (collectively, the "Parties"), by and through their undersigned counsel of record, for good cause shown, hereby stipulate and agree to extend Plaintiff's deadline to file his *Second Amended Complaint* from April 27, 2023 to May 11, 2023. This is the Parties' first request for an extension. The Parties request the extension for the following reasons:

1. On April 12, 2023, this Court held a hearing and issued a minute order regarding Defendant's Motion to Dismiss Amended Complaint (ECF No. 28). The Motion was granted, but Plaintiff was granted leave to file an amended complaint to cure the deficiencies identified. Plaintiff was given 15 days to file an amended complaint, which would be the Second Amended Complaint.

2. Since the hearing, the Parties have engaged in settlement discussions. In order to avoid incurring additional attorneys fees, the Parties seek a two week extension of the deadline in an attempt to fully resolve this matter.

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3. Due to continued discussions of resolution, the Parties respectfully request a two-week extension for Plaintiff to file his Amended Complaint from April 27, 2023 to and including **May 11, 2023**.

This stipulated extension is for good cause, and not for improper delay.

DATED this 20th day of April, 2023.

SNELL & WILMER LLP

/s/ Kelly Dove

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Attorneys for Defendant

DATED this 20th day of April, 2023.

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Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

Dated: April 20, 2023



UNITED STATES DISTRICT COURT JUDGE